

**HOFLAND & TOMSHECK**  
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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA ,

Plaintiff,

-vs-

TAI KEYSTER,

Defendant.

Case Number: 2:13-cr-83-JCM-CWH

**UNOPPOSED MOTION TO ALLOW  
TRAVEL ARRANGEMENTS**

COMES NOW Joshua Tomsheck, Esq., of the Law Firm of Hofland & Tomsheck, and hereby moves this Honorable Court (UNNOPPOSED) to allow the defendant, Tai Keyster permission to travel during the holidays from December 27, 2014 through January 3, 2015.

This motion is made and based on the enclosed affidavit of counsel, Points and Authorities, all pleadings and papers on file herein and any oral argument requested by the Court at the time of hearing.

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I.

**STATEMENT OF FACTS**

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4 1. Counsel for the Defendant was first retained, and filed notice of attorney  
5 appearance, on August 8th, 2014.

6 2. Thereafter, Defendant contacted the undersigned and requested that he  
7 determine if she had permission to travel, pursuant to her families normal holiday  
8 travel schedule to see family.  
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10 3. Following said request, the undersigned counsel contacted pre-trial  
11 services and requested they review same. Thereafter, the undersigned spoke to pretrial  
12 services officer Barlono and she indicated she had no objection to the travel request  
13 assuming the United States Attorney's office had no objection. On December 9th, 2014,  
14 the undersigned confirmed with Opposing Counsel, AUSA Sarah Griswald, who  
15 indicated she had no objection to Ms. Keyster traveling pursuant to the itinerary  
16 provided.  
17

18 4. Pursuant to Ms. Keyster's itinerary, she and her immediate family will be  
19 leaving their residence on December 27<sup>th</sup> and driving to Naples, Florida. The family  
20 will be returning, also driving, on January 3, 2015. The undersigned can provide the  
21 address and telephone number where they can be reached upon request.  
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II.

DECLARATION OF COUNSEL  
IN SUPPORT OF UNOPPOSED MOTION TO ALLOW  
TRAVEL ARRANGEMENTS

STATE OF NEVADA     )  
                                  )SS:  
CLARK COUNTY         )

JOSHUA TOMSHECK, ESQ., being first duly sworn, deposes and says:

1. I am currently counsel of record for Defendant Keyster, having filed notice of attorney appearance, on August 8th 2014, to represent Defendant..

2. Thereafter, Defendant contacted myself and requested that I determine if she had permission to travel, pursuant to her families normal holiday travel schedule to see family.

3. Following said request, I contacted pre-trial services and requested they review same. Thereafter, I spoke to pretrial services officer Barlono and she indicated she had no objection to the travel request assuming the United States Attorney's office had no objection. On December 9th, 2014, I confirmed with Opposing Counsel, AUSA Sarah Griswald, who indicated she had no objection to Ms. Keyster traveling pursuant to the itinerary provided.

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5. I sign and declare under penalty of perjury that the above statement is true and correct.

### III. CONCLUSION

DATED this 23<sup>rd</sup> day of December, 2014.

/s/ J. Tomsheck  
JOSHUA TOMSHECK, ESQ.  
Counsel for Defendant

  
UNITED STATES MAGISTRATE JUDGE  
DATED: 12-29-2014

Nunc pro tunc December 26, 2014.